

**REMARKS**

Claims 8-21 are pending in this application. Claims 14 and 17 are amended herein. The amendments are substantially cosmetic in nature and are thus not being made for any reason of patentability. Reconsideration is requested based on the foregoing amendment and the following remarks.

**Objections to the Claims:**

Claims 14 and 17 were objected to for an informality. Claims 14 and 17 were amended in substantial accord with the Examiner's suggestions. The Examiner's suggestions are appreciated. Withdrawal of the objection is earnestly solicited.

**Claim Rejections - 35 U.S.C. § 103:**

Claims 8, 18, and 20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,246,878 to Wallentin (hereinafter "Wallentin") in view of U.S. Patent Publication No. 2002/0123348 to Willars et al. (hereinafter "Willars"). The rejection is traversed. Reconsideration is earnestly solicited.

Wallentin relates to a soft handover in a CDMA cellular system, in which diversity handling operations are multistaged for a mobile connection which is controlled by an original or Source RNC (122<sub>1</sub>) and which also utilizes a secondary or Target RNC (122<sub>2</sub>), as described in the Abstract. The claimed invention, in contrast, relates, in several embodiments, to a radio communication system having a base station suitable for communicating in different frequency channels to different radio network controllers.

Thus, Wallentin is for connecting *two* base stations in serial order to a *single* mobile station over the *same* set of frequencies, as the mobile station is handed over from one base station to the other, while the claimed invention relates in several embodiments to a *single* base station communicating over separate frequencies to *different* radio network controllers. Thus the claimed invention, far from being *taught* by Wallentin, either alone or in combination with the other cited references, is actually diametrically *opposed* to Wallentin.

Claim 8, in particular, recites:

A base station to transmit first signals for first communication connections, the first signals being transmitted via an air interface using a first carrier frequency, and to transmit second signals for second communication connections, the second signals being transmitted via the air interface using a second carrier frequency.

Wallentin neither teaches, discloses, nor suggests “a base station to transmit first signals for first communication connections, the first signals being transmitted via an air interface using a first carrier frequency, and to transmit second signals for second communication connections, the second signals being transmitted via the air interface using a second carrier frequency,” as recited in claim 8. Willars does not either, and thus cannot make up for the deficiencies of Wallentin with respect to the claimed invention.

None of the base stations of Wallentin, in particular, transmit “first signals . . . using a first carrier frequency and . . . second signals . . . using a second carrier frequency,” contrary to the assertion at page 3 of the Office Action. Fig. 2 of Wallentin, rather, shows a handover of mobile station MS from base station 126<sub>1,3</sub> to base station 126<sub>2,1</sub>. Mobile station MS is not communicating with base station 126<sub>1,1</sub> in Fig. 2 at all. Although MS may be communicating with both base station 126<sub>1,3</sub> and base station 126<sub>2,1</sub> during the hand over, there is no reason to believe that either base station 126<sub>1,3</sub> or base station 126<sub>2,1</sub> would be transmitting “first signals . . . using a first carrier frequency. and . . . second signals . . . using a second carrier frequency,” as recited in claim 8, to the mobile station, let alone “first signals for first communication connections,” or “second signals for second communication connections.”

Wallentin, furthermore, relates to code division multiple access (CDMA) systems, in which the other mobile stations are utilizing the *same* radio frequency. In particular, as described in Wallentin at column 1, lines 21-28:

In a code division multiple access (CDMA) mobile telecommunications system, the information transmitted between a base station and a particular mobile station is modulated by a mathematical code (such as spreading code) to distinguish it from information for other mobile stations which are utilizing the same radio frequency. Thus, in CDMA, the individual radio links are discriminated on the basis of codes.

Since in Wallentin, the other mobile stations are utilizing the *same* radio frequency, Wallentin is not transmitting “first signals . . . using a first carrier frequency. and . . . second signals . . . using a second carrier frequency,” as recited in claim 8.

Claim 8 recites further:

A common high-frequency component which processes signals of the first communication connections and signals of the second communication connections.

Wallentin neither teaches, discloses, nor suggests “a common high-frequency component which processes signals of the first communication connections and signals of the second

communication connections,” as recited in claim 8. Willars does not either, and thus cannot make up for the deficiencies of Wallentin with respect to the claimed invention.

None of base stations 126<sub>1,1</sub>, 126<sub>1,2</sub>, 126<sub>1,3</sub> or base stations 126<sub>1,2</sub>, 126<sub>2,2</sub>, or 126<sub>2,3</sub> of Wallentin process “signals of the first communication connections and signals of the second communication connections,” contrary to the assertion at page 4 of the Office Action. Column 8, lines 45-57 of Wallentin, rather, describe the activities of target radio network controller 122<sub>2</sub> during a handover, not “a common high-frequency component which processes signals of the first communication connections and signals of the second communication connections,” as recited in claim 8. A radio network controller is not a base station, contrary to the implication in the Office Action.

Claim 8 recites further:

A first communication port and a second communication port, the first communication port being connected to the first radio network controller and the second communication port being connected to the second radio network controller.

Wallentin neither teaches, discloses, nor suggests “a first communication port and a second communication port, the first communication port being connected to the first radio network controller and the second communication port being connected to the second radio network controller,” as recited in claim 8. Willars does not either, and thus cannot make up for the deficiencies of Wallentin with respect to the claimed invention.

None of base stations 126<sub>1,1</sub>, 126<sub>1,2</sub>, 126<sub>1,3</sub> or base stations 126<sub>1,2</sub>, 126<sub>2,2</sub>, or 126<sub>2,3</sub> of Wallentin process “a first communication port and a second communication port, the first communication port being connected to the first radio network controller and the second communication port being connected to the second radio network controller,” contrary to the assertion at page 4 of the Office Action. Figs. 3A and 3B and column 5, lines 50-67 of Wallentin, rather, describe target radio network controllers 122<sub>2</sub> and 122<sub>2</sub>, not “a common high-frequency component which processes signals of the first communication connections and signals of the second communication connections,” as recited in claim 8. A radio network controller is not a base station, contrary to the implication in the Office Action.

Claim 8 recites further:

The first communication connections are communicated via the first communication port and the second communication connections are communicated via the second communication port.

Wallentin neither teaches, discloses, nor suggests, "the first communication connections are communicated via the first communication port and the second communication connections are communicated via the second communication port," as recited in claim 8. Willars does not either, and thus cannot make up for the deficiencies of Wallentin with respect to the claimed invention.

Figs. 3A and 3B and column 5, lines 50-67 of Wallentin, rather, describe target radio network controllers 122<sub>2</sub> and 122<sub>2</sub>, not "a common high-frequency component which processes signals of the first communication connections and signals of the second communication connections," as recited in claim 8, contrary to the assertion at page 4 of the Office Action. A radio network controller is not a base station, contrary to the implication in the Office Action.

Finally, claim 8 recites:

The base station assigns the first and second communication connections respectively to the first and second communication ports on the basis of connection identifiers provided in data of the first and second communications connections.

Wallentin neither teaches, discloses, nor suggests "the base station assigns the first and second communication connections respectively to the first and second communication ports on the basis of connection identifiers provided in data of the first and second communications connections," as acknowledged graciously at page 4 of the Office Action. The Office Action seeks to compensate for this deficiency of Wallentin, saying at page 5, lines 3-6:

Therefore, it would have been obvious to one of ordinary skill in the art at the time the invention was made to incorporate the teaching of Willars into view of Wallentin in order to use the same common ID at the connection as suggested by Willars at column 2, [0020].

Willars, however, describes no "the base station assigns the first and second communication connections respectively to the first and second communication ports on the basis of connection identifiers provided in data of the first and second communications connections," as recited in claim 8 either, and thus cannot make up for the deficiencies of Wallentin with respect to claim 8.

Willars, rather, is about precluding or rejecting attempted utilization of a restricted cell by an auxiliary operator's network, the restricted cell being any cell of the auxiliary operator network for which a subscription operator network has a competing cell, as described in the Abstract. The passages of Willars cited in the Office Action, at paragraphs [0020] and [0054], have nothing to do with a base station assigning "first and second communication connections respectively to the first and second communication ports on the basis of connection identifiers

provided in data of the first and second communications connections,” as recited in claim 8.

Paragraph [0020] of Willars, in fact, describes a serving radio network controller (SNRC) storing a bit string which permanently identifies each mobile that the SRNC is serving, not a base station at all. Paragraph [0054] of Willars, similarly, describes assigning each user mobile station or equipment unit (UE) 30 its own scrambling code in order for a base station 28 to identify transmissions from that particular user equipment unit (UE) as well as for the user equipment unit (UE) to identify transmissions from the base station intended for that user equipment unit (UE) from all of the other transmissions and noise present in the same area, not a base station at all.

Finally, the Office Action provides no motivation or suggestion to combine the teachings of Wallentin and Willars, as required by 35 U.S.C. § 103(a) and the M.P.E.P. §706.02(j)(D), beyond the assertion at page 5 of the Office Action that:

It would have been obvious to one of ordinary skill in the art at the time the invention was made to incorporate the teaching of Willars into view of Wallentin in order to use the same common ID at the connection as suggested by Willars at column 2, [0020].

Wallentin, however, is about handing over a handover of mobile station MS from base station 126<sub>1,3</sub> to base station 126<sub>2,1</sub>. Since there is only *one* mobile station MS being handed over, there is no need for a *common* ID in the connection. The mobile station MS is already common with itself. It is submitted, therefore, that persons of ordinary skill in the art at the time the invention was made would not have been motivated to modify Wallentin as proposed by the Office Action since Wallentin already uses same common ID, *i.e.* the ID of mobile station MS, at the connection anyway. Claim 8 is submitted to be allowable. Withdrawal of the rejection of claim 8 is earnestly solicited.

Claim 18:

Claim 18 recites:

A base station to transmit first signals for first communication connections, the first signals being transmitted via an air interface using a first carrier frequency, and to transmit second signals for second communication connections, the second signals being transmitted via the air interface using a second carrier frequency.

Neither Wallentin nor Willars teach, disclose, or suggest, “a base station to transmit first signals for first communication connections, the first signals being transmitted via an air interface using a first carrier frequency, and to transmit second signals for second communication connections,

the second signals being transmitted via the air interface using a second carrier frequency,” as discussed above with respect to the rejection of claim 8.

Claim 18 recites further:

A common high-frequency component which processes signals of the first communication connections and signals of the second communication connections.

Neither Wallentin nor Willars teach, disclose, or suggest, “a common high-frequency component which processes signals of the first communication connections and signals of the second communication connections,” as discussed above with respect to the rejection of claim 8.

Claim 18 recites further:

A first communication port and a second communication port, the first communication port being connected to the first radio network controller and the second communication port being connected to the second radio network controller.

Neither Wallentin nor Willars teach, disclose, or suggest, “a first communication port and a second communication port, the first communication port being connected to the first radio network controller and the second communication port being connected to the second radio network controller,” as discussed above with respect to the rejection of claim 8.

Claim 18 recites further:

The first communication connections are communicated via the first communication port and the second communication connections are communicated via the second communication port.

Neither Wallentin nor Willars teach, disclose, or suggest, “the first communication connections are communicated via the first communication port and the second communication connections are communicated via the second communication port,” as discussed above with respect to the rejection of claim 8.

Finally, claim 18 recites:

The base station assigns the first and second communication connections respectively to the first and second communication ports on the basis of connection identifiers provided in data of the first and second communications connections.

Neither Wallentin nor Willars teach, disclose, or suggest, “the base station assigns the first and second communication connections respectively to the first and second communication ports on the basis of connection identifiers provided in data of the first and second communications

connections,” as discussed above with respect to the rejection of claim 8. Claim 18 is thus submitted to be allowable, for at least those reasons discussed above with respect to the rejection of claim 8. Withdrawal of the rejection of claim 18 is earnestly solicited.

Claim 20:

Claim 20 recites:

A communication unit to communicate first communications connections with a first radio controller and to communicate second communications connections with a second radio network controller, the base station transmitting signals of both the first communication connections and second communication connections, the signals of the first and second communication connections being transmitted via different wireless carrier frequencies.

Neither Wallentin nor Willars teach, disclose, or suggest, “a communication unit to communicate first communications connections with a first radio controller and to communicate second communications connections with a second radio network controller, the base station transmitting signals of both the first communication connections and second communication connections, the signals of the first and second communication connections being transmitted via different wireless carrier frequencies,” as discussed above with respect to the rejection of claim 8.

Claim 20 recites further:

A common high frequency component which processes signals of the first communication connections and signals of the second communication connections.

Neither Wallentin nor Willars teach, disclose, or suggest, “a common high frequency component which processes signals of the first communication connections and signals of the second communication connections,” as discussed above with respect to the rejection of claim 8.

Claim 20 recites further:

A first communication port and a second communication port, the first communication port being connected to the first radio network controller and the second communication port being connected to the second radio network controller.

Neither Wallentin nor Willars teach, disclose, or suggest, “a first communication port and a second communication port, the first communication port being connected to the first radio network controller and the second communication port being connected to the second radio network controller,” as discussed above with respect to the rejection of claim 8.

Claim 20 recites further:

The first communication connections are communicated via the first communication port and the second communication connections are communicated via the second communication port.

Neither Wallentin nor Willars teach, disclose, or suggest, “the first communication connections are communicated via the first communication port and the second communication connections are communicated via the second communication port,” as discussed above with respect to the rejection of claim 8.

Finally, claim 20 recites:

The base station assigns the first and second communication connections respectively to the first and second communication ports on the basis of connection identifiers provided in data of the first and second communications connections.

Neither Wallentin nor Willars teach, disclose, or suggest, “the base station assigns the first and second communication connections respectively to the first and second communication ports on the basis of connection identifiers provided in data of the first and second communications connections,” as discussed above with respect to the rejection of claim 8. Claim 20 is thus submitted to be allowable, for at least those reasons discussed above with respect to the rejection of claim 8. Withdrawal of the rejection of claim 20 is earnestly solicited.

Claim 9:

Claim 9 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Wallentin and Willars in view of U.S. Patent Publication No. 2002/0110189 to Souissi et al. (hereinafter “Souissi”). The rejection is traversed. Reconsideration is earnestly solicited.

Claim 9 depends from claim 8 and adds additional distinguishing elements. Neither Wallentin nor Willars teach, disclose, or suggest, “a base station to transmit first signals for first communication connections, the first signals being transmitted via an air interface using a first carrier frequency, and to transmit second signals for second communication connections, the second signals being transmitted via the air interface using a second carrier frequency,” as discussed above with respect to the rejection of claim 8. Souissi does not either, and thus cannot make up for the deficiencies of either Wallentin or Willars with respect to claim 9.

Neither Wallentin nor Willars teach, disclose, or suggest, “a common high-frequency component which processes signals of the first communication connections and signals of the second communication connections,” as discussed above with respect to the rejection of claim



8. Souissi does not either, and thus cannot make up for the deficiencies of either Wallentin or Willars with respect to claim 9.

Neither Wallentin nor Willars teach, disclose, or suggest, “a first communication port and a second communication port, the first communication port being connected to the first radio network controller and the second communication port being connected to the second radio network controller,” as discussed above with respect to the rejection of claim 8. Souissi does not either, and thus cannot make up for the deficiencies of either Wallentin or Willars with respect to claim 9.

Neither Wallentin nor Willars teach, disclose, or suggest, “the first communication connections are communicated via the first communication port and the second communication connections are communicated via the second communication port,” as discussed above with respect to the rejection of claim 8. Souissi does not either, and thus cannot make up for the deficiencies of either Wallentin or Willars with respect to claim 9.

Neither Wallentin nor Willars teach, disclose, or suggest, “the base station assigns the first and second communication connections respectively to the first and second communication ports on the basis of connection identifiers provided in data of the first and second communications connections,” as discussed above with respect to the rejection of claim 8. Souissi does not either, and thus cannot make up for the deficiencies of either Wallentin or Willars with respect to claim 9. Claim 9 is thus also submitted to be allowable, for at least those reasons discussed above with respect to the rejection of claim 8. Withdrawal of the rejection of claim 9 is earnestly solicited.

Claims 10-13, 15, and 16:

Claims 10-13, 15, and 16 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Wallentin, Willars and Souissi in view of U.S. Patent Publication No. 2002/0086677 to Hildebrand et al. (hereinafter “Hildebrand”). The rejection is traversed. Reconsideration is earnestly solicited.

Claims 10-13, 15, and 16 depend from claim 8 and add additional distinguishing elements. Neither Wallentin, Willars nor Souissi teach, disclose, or suggest, “a base station to transmit first signals for first communication connections, the first signals being transmitted via an air interface using a first carrier frequency, and to transmit second signals for second communication connections, the second signals being transmitted via the air interface using a second carrier frequency,” as discussed above with respect to the rejection of claim 9.

Hildebrand does not either, and thus cannot make up for the deficiencies of either Wallentin, Willars or Souissi with respect to claims 10-13, 15, and 16.

Neither Wallentin, Willars nor Souissi teach, disclose, or suggest, “a common high-frequency component which processes signals of the first communication connections and signals of the second communication connections,” as discussed above with respect to the rejection of claim 9. Hildebrand does not either, and thus cannot make up for the deficiencies of either Wallentin, Willars or Souissi with respect to claims 10-13, 15, and 16.

Neither Wallentin, Willars nor Souissi teach, disclose, or suggest, “a first communication port and a second communication port, the first communication port being connected to the first radio network controller and the second communication port being connected to the second radio network controller,” as discussed above with respect to the rejection of claim 9. Hildebrand does not either, and thus cannot make up for the deficiencies of either Wallentin, Willars or Souissi with respect to claims 10-13, 15, and 16.

Neither Wallentin, Willars nor Souissi teach, disclose, or suggest, “the first communication connections are communicated via the first communication port and the second communication connections are communicated via the second communication port,” as discussed above with respect to the rejection of claim 9. Hildebrand does not either, and thus cannot make up for the deficiencies of either Wallentin, Willars or Souissi with respect to claims 10-13, 15, and 16.

Neither Wallentin, Willars nor Souissi teach, disclose, or suggest, “the base station assigns the first and second communication connections respectively to the first and second communication ports on the basis of connection identifiers provided in data of the first and second communications connections,” as discussed above with respect to the rejection of claim 9. Hildebrand does not either, and thus cannot make up for the deficiencies of either Wallentin, Willars or Souissi with respect to claims 10-13, 15, and 16. Claims 10-13, 15, and 16 are thus also submitted to be allowable, for at least those reasons discussed above with respect to the rejection of claim 8. Withdrawal of the rejection of claims 10-13, 15, and 16 is earnestly solicited.

Claims 14, 17, 19, and 21:

Claims 14, 17, 19, and 21 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Wallentin and Willars in view of U.S. Patent No. 6,173,189 to Lockhart (hereinafter “Lockhart”). The rejection is traversed. Reconsideration is earnestly solicited.

Claims 14 and 17 depend from claim 8 and add additional distinguishing elements. Neither Wallentin nor Willars teach, disclose, or suggest, “a base station to transmit first signals for first communication connections, the first signals being transmitted via an air interface using a first carrier frequency, and to transmit second signals for second communication connections, the second signals being transmitted via the air interface using a second carrier frequency,” as discussed above with respect to the rejection of claim 9. Lockhart does not either, and thus cannot make up for the deficiencies of either Wallentin or Willars with respect to claims 14 and 17.

Neither Wallentin nor Willars teach, disclose, or suggest, “a common high-frequency component which processes signals of the first communication connections and signals of the second communication connections,” as discussed above with respect to the rejection of claim 9. Hildebrand does not either, and thus cannot make up for the deficiencies of either Wallentin, Willars or Souissi with respect to claims 14 and 17.

Neither Wallentin nor Willars teach, disclose, or suggest, “a first communication port and a second communication port, the first communication port being connected to the first radio network controller and the second communication port being connected to the second radio network controller,” as discussed above with respect to the rejection of claim 9. Lockhart does not either, and thus cannot make up for the deficiencies of either Wallentin or Willars with respect to claims 14 and 17.

Neither Wallentin nor Willars teach, disclose, or suggest, “the first communication connections are communicated via the first communication port and the second communication connections are communicated via the second communication port,” as discussed above with respect to the rejection of claim 9. Lockhart does not either, and thus cannot make up for the deficiencies of either Wallentin or Willars with respect to claims 14 and 17.

Neither Wallentin nor Willars teach, disclose, or suggest, “the base station assigns the first and second communication connections respectively to the first and second communication ports on the basis of connection identifiers provided in data of the first and second communications connections,” as discussed above with respect to the rejection of claim 9. Lockhart does not either, and thus cannot make up for the deficiencies of either Wallentin or Willars with respect to claims 14 and 17. Claims 14 and 17 are thus also submitted to be allowable, for at least those reasons discussed above with respect to the rejection of claim 8. Withdrawal of the rejection of claims 14 and 17 is earnestly solicited.

Claim 19:

Claim 19 depends from claim 18 and adds additional distinguishing elements. Neither Wallentin nor Willars teach, disclose, or suggest, “a base station to transmit first signals for first communication connections, the first signals being transmitted via an air interface using a first carrier frequency, and to transmit second signals for second communication connections, the second signals being transmitted via the air interface using a second carrier frequency,” as discussed above with respect to the rejection of claim 18. Lockhart does not either, and thus cannot make up for the deficiencies of either Wallentin or Willars with respect to claim 19.

Neither Wallentin nor Willars teach, disclose, or suggest, “a common high-frequency component which processes signals of the first communication connections and signals of the second communication connections,” as discussed above with respect to the rejection of claim 18. Lockhart does not either, and thus cannot make up for the deficiencies of either Wallentin or Willars with respect to claim 19.

Neither Wallentin nor Willars teach, disclose, or suggest, “a first communication port and a second communication port, the first communication port being connected to the first radio network controller and the second communication port being connected to the second radio network controller,” as discussed above with respect to the rejection of claim 18. Lockhart does not either, and thus cannot make up for the deficiencies of either Wallentin or Willars with respect to claim 19.

Neither Wallentin nor Willars teach, disclose, or suggest, “the first communication connections are communicated via the first communication port and the second communication connections are communicated via the second communication port,” as discussed above with respect to the rejection of claim 18. Lockhart does not either, and thus cannot make up for the deficiencies of either Wallentin or Willars with respect to claim 19.

Neither Wallentin nor Willars teach, disclose, or suggest, “the base station assigns the first and second communication connections respectively to the first and second communication ports on the basis of connection identifiers provided in data of the first and second communications connections,” as discussed above with respect to the rejection of claim 18. Lockhart does not either, and thus cannot make up for the deficiencies of either Wallentin or Willars with respect to claim 19. Claim 19 is thus also submitted to be allowable, for at least those reasons discussed above with respect to the rejection of claim 8.

Claim 21:

Claim 21 depends from claim 18 and adds additional distinguishing elements. Neither Wallentin nor Willars teach, disclose, or suggest, “a communication unit to communicate first communications connections with a first radio controller and to communicate second communications connections with a second radio network controller, the base station transmitting signals of both the first communication connections and second communication connections, the signals of the first and second communication connections being transmitted via different wireless carrier frequencies,” as discussed above with respect to the rejection of claim 20. Lockhart does not either, and thus cannot make up for the deficiencies of either Wallentin or Willars with respect to claim 21.

Neither Wallentin nor Willars teach, disclose, or suggest, “a common high-frequency component which processes signals of the first communication connections and signals of the second communication connections,” as discussed above with respect to the rejection of claim 20. Lockhart does not either, and thus cannot make up for the deficiencies of either Wallentin or Willars with respect to claim 21.

Neither Wallentin nor Willars teach, disclose, or suggest, “a first communication port and a second communication port, the first communication port being connected to the first radio network controller and the second communication port being connected to the second radio network controller,” as discussed above with respect to the rejection of claim 20. Lockhart does not either, and thus cannot make up for the deficiencies of either Wallentin or Willars with respect to claim 21.

Neither Wallentin nor Willars teach, disclose, or suggest, “the first communication connections are communicated via the first communication port and the second communication connections are communicated via the second communication port,” as discussed above with respect to the rejection of claim 20. Lockhart does not either, and thus cannot make up for the deficiencies of either Wallentin or Willars with respect to claim 21.

Neither Wallentin nor Willars teach, disclose, or suggest, “the base station assigns the first and second communication connections respectively to the first and second communication ports on the basis of connection identifiers provided in data of the first and second communications connections,” as discussed above with respect to the rejection of claim 20. Lockhart does not either, and thus cannot make up for the deficiencies of either Wallentin or Willars with respect to claim 21. Claim 21 is thus also submitted to be allowable, for at least

those reasons discussed above with respect to the rejection of claim 8. Withdrawal of the rejection of claim 21 is earnestly solicited.

**Conclusion:**

Accordingly, in view of the reasons given above, it is submitted that all of claims 8-21 are allowable over the cited references. Allowance of all claims 8-21 and of this entire application is therefore respectfully requested.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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